

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

BENJAMIN SHACAR,

Defendant

CRIMINAL No. 3:21-cr-30028-MGM

**ASSENTED-TO MOTION TO EXTEND FILING DATE FOR RESPONSE TO  
DEFENDANT'S MOTION TO SUPPRESS STATEMENTS (DKT. NO. 144)**

The United States of America, by and through its attorneys, Leah B. Foley, United States Attorney, and Thomas A. Barnico, Jr, Assistant United States Attorney (the “Government”) hereby moves this Court to extend the current filing deadline to respond to the defendant’s Motion to Suppress Statements. [Dkt. No. 144].

The Court previously set a filing deadline of January 29, 2025 for defendant to file motion suppress in this matter and a corresponding Government response deadline of February 12, 2025. [Dkt. No. 137]. On January 29, 2025, the defendant filed two motions to suppress – Motion to Suppress Evidence Seized as a Result of the Execution of a Search Warrant [Dkt. No. 140 and 146] and Motion to Suppress Statements [Dkt. No. 144]. The Government filed a Motion for Leave to File Under Seal its response to the defendant’s Motion to Suppress Evidence Seized Pursuant to a Search Warrant on February 12, 2025. It intends to file the corresponding response upon the Court granting permission to file under seal.

The Government requires an additional two weeks to draft and file a response to Defendant’s Motion to Suppress Statements. [Dkt. No. 144]. Defense counsel assents to this motion.

Respectfully Submitted,

LEAH B. FOLEY  
United States Attorney

Date: February 12, 2025

By: /s/ Thomas A. Barnico, Jr.  
Thomas A. Barnico, Jr. (BBO#696929)  
Assistant United States Attorney  
United States Attorney's Office  
300 State Street, Suite 230  
Springfield, MA 01105

**CERTIFICATE OF SERVICE**

I, Thomas A. Barnico, Jr., hereby certify that the foregoing was filed through the Electronic Court filing system on February 12, 2025 and it will be sent electronically to the registered participants as identified on the Notice of Electronic filing.

Date: February 12, 2025

/s/ Thomas A. Barnico, Jr.  
Thomas A. Barnico, Jr.  
Assistant United States Attorney